



## Notice of Service of Process

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Transmittal Number: 17778278  
Date Processed: 02/16/2018

**Primary Contact:** Kathryn Smith  
Dollar Tree, Inc.  
500 Volvo Parkway  
Chesapeake, VA 23510

**Electronic copy provided to:** Donna Frangione  
JJ Jacobson-Allen  
Cynthia Bertucci

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**Entity:** Dollar Tree Stores, Inc.  
Entity ID Number 3697563

**Entity Served:** Dollar Tree Stores, Inc.

**Title of Action:** Linda Russell vs. Dollar Tree Stores, Inc

**Document(s) Type:** Summons/Complaint

**Nature of Action:** Personal Injury

**Court/Agency:** Cook County Circuit Court, Illinois

**Case/Reference No:** 2018-L-001429

**Jurisdiction Served:** Illinois

**Date Served on CSC:** 02/15/2018

**Answer or Appearance Due:** 30 Days

**Originally Served On:** CSC

**How Served:** Personal Service

**Sender Information:** Thomas M. Paris  
312-759-1600

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**To avoid potential delay, please do not send your response to CSC**

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## IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

LINDA RUSSELL

v.

DOLLAR TREE STRORES, INC.No. 2018-L-001429

Defendant Address:  
DOLLAR TREE STRORES, INC.  
801 ADLAI STEVENSON DRIVE  
SPRINGFIELD, IL 62703

☒ SUMMONS ☐ ALIAS - SUMMONS

To each defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> Richard J. Daley Center, 50 W. Washington, Room <u>801</u> , Chicago, Illinois 60602 |  |  |
| <input type="checkbox"/> District 2 - Skokie<br>5600 Old Orchard Rd.<br>Skokie, IL 60077                                 | <input type="checkbox"/> District 3 - Rolling Meadows<br>2121 Euclid 1500<br>Rolling Meadows, IL 60008 | <input type="checkbox"/> District 4 - Maywood<br>Maybrook Ave.<br>Maywood, IL 60153              |
| <input type="checkbox"/> District 5 - Bridgeview<br>10220 S. 76th Ave.<br>Bridgeview, IL 60455                           | <input type="checkbox"/> District 6 - Markham<br>16501 S. Kedzie Pkwy.<br>Markham, IL 60428            | <input type="checkbox"/> Richard J. Daley Center<br>50 W. Washington, LL-01<br>Chicago, IL 60602 |

You must file within 30 days after service of this Summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

To the officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than thirty (30) days after its date.

☒ Atty. No.: 30118Name: PARIS THOMAS MAtty. for: LINDA RUSSELLAddress: 55 W MONORE 3950City/State/Zip Code: CHICAGO, IL 60603Telephone: (312) 759-1600Primary Email Address: tp@tomparislaw.com

Secondary Email Address(es):

denise@tomparislaw.comWitness: Thursday, 08 February 2018/s/ DOROTHY BROWN

DOROTHY BROWN, Clerk of Court



Date of Service: \_\_\_\_\_

(To be inserted by officer on copy left with Defendant or other person)

\*\*Service by Facsimile Transmission will be accepted at:

\_\_\_\_\_  
(Area Code) (Facsimile Telephone Number)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

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CIRCUIT COURT OF  
COOK COUNTY, ILLINOIS  
LAW DIVISION  
CLERK DOROTHY BROWN

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT - LAW DIVISION

LINDA RUSSELL, )  
)  
Plaintiff, )  
)  
vs. )  
)  
DOLLAR TREE STORES, INC. )  
)  
Defendant. )

**COMPLAINT AT LAW**

NOW COMES the Plaintiff, LINDA RUSSELL, by and through her attorney in this regard, THOMAS M. PARIS, complaining of the Defendant, DOLLAR TREE STORES, INC., states as follows:

1. On and before March 23, 2017, the Defendant, DOLLAR TREE STORE, possessed, owned, operated, managed, maintained and controlled or had a duty to possess, operate, manage, maintain and control, both directly and indirectly, individually and through its agents, servants and employees, a certain retail store located at 6208 South Western Avenue, Chicago, IL 60636, and further was responsible for the conduct of its store clerks who were assigned to stock merchandise and help customer, including training in handling customer requests regarding locating merchandise for sale.

2. On March 23, 2017, LINDA RUSSELL, was a business invitee lawfully on the premises of the aforementioned store for the purpose of shopping.

3. As Plaintiff was shopping she encountered numerous boxes and plastic lid on the floor and slipped and fell upon the same.

4. On March 23, 2017, Defendant, DOLLAR TREE STORE, knew or reasonably should have known that the aisle containing the lid was an unreasonably dangerous condition and further knew or should have known that Plaintiff would have difficulty navigating this hazard.

5. At all times mentioned herein, it was the duty of the Defendant, DOLLAR TREE STORE, exercise ordinary care to maintain the property and premises in a reasonable safe condition.

6. At all times mentioned here, the Defendant, DOLLAR TREE STORE, was careless and negligent in one of more of the following respects:

- a. Allowed and permitted a lid to remain in said aisle which constituted an unreasonably dangerous condition to the safe movement of customers.
- b. Failed to properly and adequately remove the lid from upon the aisle flooring, so as to allow safe passage for patrons.
- c. Failed to take reasonable steps towards the elimination of the dangerous condition such as it did as a matter of course in other section of the store.
- d. Failed to warn the Plaintiff of the dangerous condition of said aisle, when the Defendant knew, or in the exercise of ordinary care should have known, that said warning was necessary to prevent injury to the Plaintiff.
- e. Failed to make a reasonable inspection of the aforesaid premises and said aisle, when the Defendant knew, or should have known, that said inspection was necessary to prevent injury to the Plaintiff.
- f. Created a dangerous condition.

7. That on the aforementioned date and as a result of the aforesaid acts and/or omissions of the Defendant, the Plaintiff was caused to slip and fall on a plastic lid which was on the floor.

8. That as a direct and proximate result of one or more of the aforesaid careless and negligent acts and/or omissions of the Defendant, LINDA RUSSELL then and there sustained severe

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injuries. In suffering said injury she incurred medical expenses, lost wages, bodily injury and will in the future continue to incur damages of a personal and pecuniary nature.

WHEREFORE, for all the foregoing reasons, Plaintiff, LINDA RUSSELL, prays judgment against Defendant, DOLLAR TREE STORE, INC., in an amount in excess of fifty thousand dollars (\$50,000), plus the costs of this suit.

Respectfully Submitted,

**LINDA RUSSELL**

By: /s/Thomas M. Paris  
Her Attorney

Thomas M. Paris, Esq.  
55 W. Monroe Street  
Suite 3950  
Chicago, IL 60603  
(312) 759-1600  
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